

# **EXHIBIT 2**

11/13/2024

Richard Kadrey, et al. v. Meta Platforms, Inc.  
Highly Confidential

Michael Patrick Clark 30(b)(6), Vol I &amp; Vol II

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IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

RICHARD KADREY, et al.,	)	
	)	
Individual and Representative	)	Lead Case No.
Plaintiffs,	)	
	)	3:23-cv-03417-VC
v.	)	
	)	
Meta Platforms, Inc.,	)	
	)	
Defendant.	)	
	)	

\*\* H I G H L Y C O N F I D E N T I A L \*\*

30(b)(6) VIDEOTAPED DEPOSITION OF  
META PLATFORMS, INC.

BY: MICHAEL PATRICK CLARK

Denver, Colorado

VOLUMES I AND II

Wednesday, November 13, 2024

Thursday, November 14, 2024

Reported stenographically by:  
Michelle Kirkpatrick, RDR-CRR-CRC-CRI, FCRR

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NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

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RICHARD KADREY, ET AL., )  
INDIVIDUAL AND REPRESENTATIVE )  
PLAINTIFFS, ) LEAD CASE NO.  
v. ) 3:23-cv-03417-VC  
META PLATFORMS, INC., )  
DEFENDANT. )  
)

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\* \* \* H I G H L Y C O N F I D E N T I A L \* \* \*  
\* \* \* A T T O R N E Y S ' E Y E S O N L Y \* \* \*

VIDEO-RECORDED 30(B)(6) DEPOSITION OF  
MICHAEL CLARK  
VOLUME III  
WEDNESDAY, NOVEMBER 20, 2024  
SAN FRANCISCO, CALIFORNIA  
9:38 A.M. PST

REPORTED BY AUDRA E. CRAMER, CSR NO. 9901

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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

_____ RICHARD KADRY, et al,	)	CASE NO.
	)	3:23-cv-03417-VC
Plaintiff,	)	
-against-	)	
META PLATFORMS, INC.	)	
Defendant.	)	
_____	)	

\*\*\*HIGHLY CONFIDENTIAL\*\*\*

\*\*\*UNDER THE PROTECTIVE ORDER\*\*\*

VIDEO-RECORDED DEPOSITION OF  
MICHAEL CLARK 30 (B) (6)  
Zoom Video Conferencing  
12/19/2024  
3:06 p.m. (MST)

REPORTED BY: MONIQUE CABRERA

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